

CLIFTON JACKSON AFFIDAVIT AND APPENDIX OF EXHIBITS ARE NUMBERED [first two cover pages of affidavit unnumbered, iii-ixiii] IN ROMAN NUMERAL. EXHIBIT PAGES ARE CROSS REFERENCED AS APPENDIX [Appendix Pages are numbered 1-555] PAGES. AFFIDAVIT AND EXHIBITS ARE IN SUPPORT OF 26B MOTION TO REOPEN STATE OF OHIO v. CLIFTON JACKSON, CASE NO. 11CR083104, NINTH DISTRICT COURT OF APPEALS CASE NO. 14CA010555, Not Limited Too.

# EXHIBIT

## B

EXHIBITS A-AAAE IN SUPPORT OF CLIFTON JACKSON ENCLOSED AFFIDAVIT AND APPENDIX PREPARED MARCH OF 2016 OF A DETAILED TIME LINE OF FACTUAL EVENTS BETWEEN JUNE 14<sup>th</sup>, 2011 AND OCTOBER OF 2015 TO THE BEST OF MY LAYMEN LEGAL ABILITIES.  
THIS EXHIBIT "B" IS REFERENCED THROUGHOUT, not limited too.



# Ohio State Highway Patrol Report Of Investigation

INCIDENT NO : 11-010115-1090	INCIDENT DATE / TIME (MM/DD/YY/TTTT) 6/14/2011 08:44	PHOTO POUCH NO. 90-7299
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**NOTES :**

UNIT NO : 0374 NAME :SGT. BRIAN J GOCKSTETTER

6/18/2011 16:00

The case was reviewed by Sgt. B.J. Gockstetter.

UNIT NO : 0696 NAME :SGT. ANTHONY L DECHOUDENS

6/15/2011 11:39

06/15/11

Case reviewed by Sgt. A.L. DeChoudens. Victim/Witness does not apply. Solvability factor is excellent. Criminal Patrol Point was entered into RIMS. The \$1262 in US currency was taken to the Key Bank in Milan, Ohio and placed on a certified check. The check was made to the US Marshall Service and released to them.

UNIT NO : 0700 NAME :TPR. CHRISTOPHER H BEYER

6/14/2011 13:30

LHP110614000975

06/14/11

0844 Hours

While on patrol on the Ohio Turnpike at milepost 135 EB (Brownhelm twp), I observed a silver 2010 Toyota Camry bearing PA registration GSC 0641. The vehicle was following a mobile home in front of it by 2-3 car lengths away in the right lane at approximately 60-65 mph. At the time I observed the violation I was in the middle lane 300-400 feet behind the vehicle.

I initiated a traffic stop of the vehicle at milepost 137 EB and came in contact with the driver and only occupant, Clifton A. Jackson (3-5-69). I advised him of the following too close violation and asked for his license, registration and insurance. He handed me his New York (residence in Buffalo, NY) license. I asked where he was going to. He stated, "Cleveland to his cousin's house". I asked who owned the car and he stated, "My cousin". I asked where he was coming from. He stated his mom's house near the Detroit area in Beloit, MI. He stated he was visiting his mom as she is sick. He handed me a rental agreement for the vehicle (Renters name was Latriece Thomas). I asked when she rented the car for him. He stated, "yesterday actually". Mr. Jackson stated she had the vehicle for a while and then gave it to him. I asked what his girlfriend's name was. He stated, "Latriece Thomas". I asked where he was going in Cleveland. He stated, "Off 480 area, near Stoney Brook or Stoney Point". I then returned to my patrol car. While back at my patrol car I radioed Tpr. Mike Trader and asked that he and his K-9 partner, Argo, come to my location and do a sniff of the vehicle.

0850 Hours

Tpr. Trader arrived on scene. I walked back up to the vehicle, where Mr. Jackson was and asked him to come back to my patrol car. After asking him to come back to my patrol car he was hesitant to exit the car and looked around. When he did exit the car he did so slow and deliberately. He took 2 cell phones from his vehicle and brought them with him. Prior to being seated in my car he was voluntarily patted down. He was asked to sit down in the back seat of my patrol car which he did voluntarily.

0851

A review of my in car audio/video tape after the stop was over revealed the below cell phone conversations of Mr. Jackson with other person's on speaker phone while the vehicle was being searched. Mr. Jackson was in the back seat of my patrol car when these conversations took place.

While sitting in the back seat of my patrol car Mr. Jackson began to speak with a female on the speaker phone from one of his cell phones, which was recorded by the in car audio. He states, "they are about to put the dog on me". She says, "is you serious"? A pause is heard in the conversation followed by the female saying, "...damn". The female asks what am I supposed to do? He then tells the female to call his brother. The female asks Mr. Jackson do you have alot? He states, "no". He tells the female to be quiet they are walking the dog around the car.

0853

I assisted in traffic control with Trooper Trader and Argo as they walked around the vehicle as it was parked close to the white line. There was a positive K-9 indication to the vehicle by Argo on the left side of the vehicle, I re-approached my patrol car to speak with Mr. Jackson. As I walked back to my car Mr. Jackson was heard on the in car audio telling the female to be quiet, as I was walking back to the car. I opened the car door and read Mr. Jackson his Miranda Rights. I advised him the K-9 indicated to his vehicle. I asked him if there was any reason the K-9 would indicate to the vehicle. He stated, "no". I asked him if he had used or had any drugs or knew of anyone that had used or had drugs in the car. He stated, "no". I asked if everything in the car was. He hesitated stating, "not everything in the car is mine but there's no drugs in the car". I then asked what in the car was not his. He again retracted his statement and said all the contents inside the car were his.

REPORTING OFFICER : Tpr. CHRISTOPHER H BEYER	UNIT NO : 0700	DATE : 6/14/2011
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## Ohio State Highway Patrol Report Of Investigation

0855  
As we began a probable cause search of the car Mr. Jackson began to speak to the female again stating, "hold on babe". He then phones a male speaking to him stating, "whats up bro". Mr. Jackson proceeds to speak to the male regarding the narcotics in the car. The male asks if he stashed it. Mr. Jackson stated, "No it wouldn't fit." The male asks where it's at. Mr. Jackson stated "in the bag". The male states, "You're fucked". Mr. Jackson goes on to state over and over, "he didn't have a reason to stop me".

0859  
Inside a large orange duffel bag in the trunk I found 2 kilograms of suspected cocaine placed side by side wrapped in black tape and saran wrap. It was in the front zipper portion of the bag. Nothing else was in the front of the bag with it. The center of the bag contained brand new male's dress shirts and blue jeans (tags on still). On the right side of the bag with the clothing was two plastic bags containing a silver colored watch that said Breitling on it. The second bag contained a diamond looking necklace, bracelet, and ring. I seized the jewelry. Also found was a black toiletries bag with miscellaneous toiletry products. In the bottom of the bag was a zipper area with 4 boxes of male shoes, some tennis shoes and some Italian dress shoes.

I re-approached the patrol car and advised Mr. Jackson he was being placed in handcuffs. He was heard on his cell phone stating to the male he was being arrested. I advised Mr. Jackson to put his arms behind his back in the back seat and not get out of the car. He did not do as instructed immediately. I advised him to not give us any problems as we had a K-9 dog.

0901  
Mr. Jackson was subsequently placed in handcuffs behind his back and placed under arrest and taken to the front of my patrol car. After being placed in handcuffs he was asked what was up there, referring to the drugs. He stated he didn't want to be disrespectful but didn't want to say anything. A search incident to custodial arrest was done on Mr. Jackson in front of my patrol car, on camera. Inside his left front jeans pocket was \$1,262 dollars of US currency. I asked what type of work he did. Mr. Jackson stated he was a collections agent. It was seized and handed to Trooper Trader. He was later given a state property seizure form, which he later signed and was given a copy of.

No illegal narcotics were seized on Mr. Jackson and he was placed in the back seat of the patrol car. After being placed in my car he began a conversation with the male again, speaking about the stop. He placed his cell phone on speaker phone to talk to the other male subject. A further search of the vehicle found no more illegal narcotics. The vehicle was towed from the scene by Rich's Towing to the Middleburg Heights office.

L.E.A.D.S. Had been out of service on the initial stop and had since came back into service. I radioed District 10 radio Mr. Jackson's license information and license plate to run. I also asked for a criminal history check be run as well.

Prior to leaving the scene Mr. Jackson's two cell phones were seized and placed inside an evidence bag. The cell phones were a Motorola cell phone Serial # 364VlyT9WX and a Samsung cell phone serial # AA1B106AS.

Mr. Jackson was taken to the Milan Patrol Post for charges and other forms. D.E.A. Agent Tallano and an assistant came to the post and spoke with Mr. Jackson. He declined to speak with them. Trooper Weaver came to the Milan Patrol Post and assisted with forms and the incident. He took the jewelry to the Crider Jewelers in Perkins Township, where it was inspected. It was found to be all cubic zirconia. It was later released back to Mr. Jackson. The \$1,262 was given to Sergeant Anthony L. Dechoudens and was taken to Key Bank in Milan Ohio. A cashier's check was obtained and subsequently made out to the Ohio Marshall's Service. It was turned over to Agent Tallano and his assistant. Both cell phones were released into Agent Tallano's custody.

At 1100 hours, Trooper Trader cut into one of the packages. As he cut into it he found axle grease on it, inside the packaging (tape, saran wrap, axle grease). A N.I.K. test was completed for suspected cocaine, which was of a white powdery substance and the results were positive for cocaine.

The narcotics and money were subsequently turned over to Agent Tallano. Mr. Jackson was served with a forfeiture notice for his money. He signed it and I gave him a copy. He was given a copy of his charges for aggravated drug trafficking, possession of cocaine, and criminal tools. He was then transported to the Lorain County Jail.

In looking at his criminal history I found it to be 10-20 pages. He has had OVER 10 FELONY DRUG CHARGES 2 OF WHICH WERE FEDERAL CONVICTIONS. HE HAS SPENT NUMEROUS YEARS IN PRISON FOR THESE AND OTHER CRIMINAL OFFENSES.

Mr. Jackson was taken to Vermilion Municipal Court for arraignment. His bond was set at 500,000 cash surety. His pre-trial was set for 6-21-11 at 9:15 a.m.

I 8-11-0068 NOTES  
YUCID

Clifton A JACKSON ID# 171 445 740

47 Oxford St UPR NY

Buffalo NY 14209 issued 10-25-10

DOB 3-5-69 ex 3-5-13

B/M Br eyes 5'08

6/14/11 @ 11:51 am

AT read right @ 11:53 am

A initial & refused to sign @ 11:54

Asked "what I'm being charged with?"

end at 11:57 am

TXT

6/14 @ 6:26 AM TO: A H Zo 2 714-530-5100

"If I haven't called you already know  
Nothing's changed"

Rec 6/14 @ 6:27 AM From: AH Zo 2 to 155248-6725

"OK"

To 13137781834 Scot 6/15 @ 11:43 pm

"How you thought that when you spoke  
w. m. no and you said you were calling  
me right back I'm sitting here waiting that  
~~not~~ neither of you would answer"

June 14<sup>th</sup> @ 11:20 am

- Geno Tallano & SA Szczepinski

- 1262

- 2 individual ~~bricks~~ bricks @ 11 am tested

wrapped in clear plastic sellaphane

another cover of purple plastic wrap

another layer of clear plastic wrap

All inside clear plastic bag ziplock

135 Rt lane (3)

following mobile home to close

slower than posted

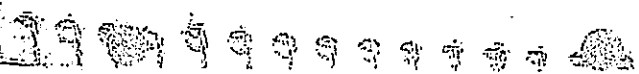
Rental car Elaine Thomas 5/19 @ Cle Hopkins

return will be made Heights

Latrice Thomas (a/w) 579-3651

Cousin

- Dog Mike Trader & Bigo & Chris Buyer
- the Drivers side Back door
- orange duffel trunk
- a keys in front logo pocket of duffel
- ID on person's pocket
- jewelry & necklace, watch
- bracelet, ring



OSAP

LT. Combs

216-337-8972

Troopers  
(K9 Azgo)

CHRIS Beyer - PH# (440) 213-5379

Mike Trader K9 Troop

LATRICE Thomas

(216) 579-3651

Rental Vehicle

PLT # GSC 0641

P.A

Rental Agency

Case # 18-11-0068 / WGEID

1. (2) Kilos

2. (2) Phones N2

3. U.S. Marshal Check

4. CD <sup>N2</sup> OF Recorded Calls by  
Δ in OSAP Unit

5. Photos <sup>1407</sup> Δ, drugs, #

OSAP  
STOP

8:44 AM

MM # 136

observed # 133

Following to

Close # 3 lane

By: Beyer <sup>OSAP</sup>

6-16-11

your phones which some totaled a  
wasted day. [I ~~remembered~~ was sleep  
man I thought that you and K.

- From 13139781836 to 15852026745 6/13  
@ 11:48 pm

"But I did give you his number right?"  
- to 13139781834

"Yes you did do that no chaser"  
from my Ba (714)809-0759 (girlfriend)  
6/13 @ 11:21 AM

- Markel Curry 08970-055

Low security correctional inst  
Allenwood P.O. Box 1000 white  
deer pa 17887

- To Leonard 6/12 @ 1:10 PM  
(714)381-1937

"This peen call me asap so  
you can fix this breakline. I got you.  
You have to come to my building ASAP.  
Lets go bc you already know



80054 mobile

Recent calls

most rec  
to  
oldest

- my Ba 716-809-0959 @ 10:41am
- ↑ A H Tuan 716-578-6553 @ 9:56am
- ↑ A H A W Tommy 716-948-4362 @ 8:27am (31)
- ↑ Eternal 716-544-8813 @ 8:14am (119)
- A H H Rod 716-289-5687 @ 7:08am (14)
- WIKIC PTT  
TAKIC CUZ 131\*881\*3294 @ 6:30am (319)
- PTT Cusin peeps 131\*881\*1391 @ 6:21am (10)
- A H ZO (716)-536-5106 @ 12:44am (8:00)
- BB 313-596-4981 @ 10:06pm (29)
- Leonard 716-381-1937 @ 9:03pm (5)
- ↑ 716-791-2409 @ 8:44pm (229)
- ↑ A H Neish 716-578-3145 @ 8:31pm (24)
- ↑ A H A W Steve 716-578-8260 @ 8:30pm (11)
- ↑ Angel B 313-220-8789 @ 5:53pm (152)
- ↑ 313-978-1236 @ 2:25 (4:45)
- Black Dude (716) 931-4988 @ 11:16am (133)
- PTT CUSIN cheese 103\*740\*8694  
716-846-9255 @ 10:53am (105)
- ↑ A H A W Boogie 716-544-6297 @ 5:41pm
- 716 597 - 3163 @ 4:44pm (107)